

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

GLENN A. BERGENFIELD, P.C
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Attorney for Plaintiff, Zuhdi Karagjozi

In re:

Chapter 11 Proceedings

KARA HOMES, INC., et al ¹

Debtors.

Lead Case No. 06-19626 (MBK)
(Jointly Administered)

¹ The following Affiliates filed for Chapter 11 protection, which cases are being jointly administered: Bergen Mills Estates, LLC, 06-19758; Country Club Estates by Kara, LLC, 06-19744; Estates at Galloway Woods, LLC, 06-19746; Hartley Estates by Kara, LLC, 06-19759; Horizons at Birch Hill, LLC, 06-19767; Horizons at Shrewsbury Commons, LLC, 07- 11496; Horizons at Woodlake Greens, LLC, 06-19745; Horizons at Woods Landing, LLC, 06-19760; Kara at Atlantic Hills, LLC, 07-10489; Kara at Buckley Estates, LLC, 06-19742; Kara at Crine West, LLC, 06-19770; Kara at Dayna Court, LLC, 06-19743; Kara at the Glen Eyre, LLC, 06-19765; Kara at Hawkins Ridge, LLC, 06-19757; Kara at Lacey, LLC, 06-19738; Kara at Monroe, LLC, 06-21513; Kara at Mt. Arlington I, LLC, 06-19780; Kara at Mt. Arlington, II, LLC, 06-19782; Kara at Navesnik, LLC, 06-19737; Kara at Park Ridge Estates, LLC, 06-19783; Kara at the Tradewinds, LLC, 06-19741; Kara Homes at Enclave II, LLC 06-22341; Sterling Acres at Monroe, LLC, 06-19774; The Landings at Manahawkin, LLC, 06-19740; Winding Run Estates by Kara, LLC, 06-19764; and Woodland Estates at North Edison, LLC, 06-21512. On February 13, 2007, six additional Affiliates filed for Chapter 11 protection: Forest Edge Estates by Kara, LLC, 07-11941; Kara at Farrington Ridge, LLC, 07-11939; Limerick Estates by Kara, LLC, 07-11937; Kara at Orchard Meadows, LLC, 07-11932; Summerfield Estates by Kara, LLC, 07-11928; and Kara at Freehold, LLC, 07-11924. On March 12, 2007, Kara at Dover, LLC filed a Chapter 11 Petition, 07-13367. On June 8, 2007, 22 additional Affiliates filed for Chapter 11: The Shores at Little Egg Harbor, LLC, 07-18057; Kara of Monmouth, LLC, 07-18062; Bridgepoint at Harbor Heights, LLC, 07-18065; Kara of Middlesex, LLC, 07-18068; Kara at Emerald Hill, LLC, 07-18069; Kara at Evergreen Estates, LLC, 07-18070; Kara at North Haledon, LLC, 07-18072; Kara at Island Breeze, LLC, 07-18074; Kara at Island Crest, LLC, 07-18075; Kara at Island Gate, LLC, 07-18076; Island Woods Estates by Kara Homes, LLC, 07-18078; Kara at Kensington Hill, LLC, 07-18079; Kara at Lakeshore Harbor, LLC, 07-18081; K & W Builders, Inc., 07-18083; Kara at Cedar Grove, LLC, 07-18085; Sterling Woods at Barnegat, LLC, 07-18086; Kara at Tallymawr, LLC, 07-18088; Kara White Oak, LLC, 07-18091; Kara at Berkley, LLC, 07-18094; Kara at Madison, LLC, 07-18096; and on June 11, 2007, KH Builders, LLC, 07-18165 filed a Chapter 11 petition; on August 27, 2007 Kara Service Company LLC filed a Chapter 11 petition, 07-22183 and finally on September 5, 2007, Kara Homes Development LLC, s/i/i to Kara Homes Development Corp., filed a voluntary Chapter 11 petition, 07-22698 (collectively, the "Affiliate Debtors").

ZUHDI KARAGJOZI,

Plaintiff,

vs.

DAVID BRUCK, ESQ. and GREENBAUM,
ROWE, SMITH, RAVIN, DAVIS & HIMMEL,
LLP now known as GREENBAUM, ROWE,
SMITH & DAVIS, LLP

Defendants.

Adv. Pro. No. 12-1185 (MBK)

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION FOR
WITHDRAWAL OF REFERENCE
PURSUANT TO 28 U.S.C. § 157 AND
D.N.J. LBR 5011-1**

To: Shalom Stone, Esq.
Brown, Moskowitz & Kallen, PC
180 River Road
Summit, New Jersey 07901

Justin P. Walder
Pashman Stein Walder Hayden
Court Plaza South
21 Main Street, Suite 200
Hackensack, New Jersey 07601

SIRS:

PLEASE TAKE NOTICE that on Monday, February 6, 2017, at 10:00 in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorney for the Plaintiff, Zuhdi Karagjozi, shall move before the United States District Court for the District of New Jersey, Trenton Division, for an Order of Withdrawal of the Reference pursuant to U.S.C. § 157 and D.N.J. LBR 5011-1.

PLEASE TAKE FURTHER NOTICE that in support of the within application, Plaintiff shall rely upon the Certification of Glenn A. Bergenfield, Esq. and Brief. Pursuant to D.N.J. LBR 9072-1, a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiff hereby requests oral argument in connection with the motion.



GLENN A. BERGENFIELD

Dated: December 28, 2016